

CHAPTER 15

HISTORICALLY BLACK COLLEGES AND UNIVERSITIES

- 15-1 **PURPOSE.** This Chapter provides comprehensive guidance for monitoring the Historically Black Colleges and Universities (HBCU) program. This program awards grants to HBCUs to address community development needs in their localities that primarily benefit the low- and moderate-income residents of the community in which the HBCU is located. The funds help HBCUs to expand their role and effectiveness in helping their communities with neighborhood revitalization, housing, and economic development needs. Eligible applicants for funding are limited to 104 HBCUs which have been designated by the U.S. Department of Education in 34 CFR 608.2 (in accordance with that Department's responsibilities under Executive Order 12677, dated April 28, 1989).

The HBCU program is one of several "special purpose grants" for which Community Development Block Grant (CDBG) funds are set aside each year. It is authorized under Section 107(b)(3) of the Housing and Community Development Act of 1974, as amended. HBCU funds are governed by certain CDBG regulations contained in 24 CFR 570.400, 570.404 and 24 CFR Part 570, Subparts A, C, J, K and O, as amended, revised or updated.

The funds are awarded on a competitive basis. HUD publishes a Notice of Funding Availability (NOFA) in the Federal Register for the HBCU Program. Applicants must submit specific information about the project(s) they propose to undertake. HBCUs are also required to obtain certifications from the Chief Executive Officer of the unit of general local government in which they propose to conduct activities that the activities are consistent with the Consolidated Plan or another officially approved Comprehensive Plan of the jurisdiction.

- 15-2 **APPLICABILITY.** Because HBCU activities are governed by CDBG requirements, the HUD reviewer will need to determine if other CPD Monitoring Handbook Exhibits will need to be included as part of the monitoring, based upon CPD's risk analysis process (see Chapter 2). To the extent that an HBCU monitoring consists of an area included elsewhere in this Handbook, the reviewer is to use the applicable Exhibit(s).

15-3 PREPARING FOR MONITORING. To maximize effectiveness, HUD reviewers must be familiar with the HBCU program as well as the HBCU's program structure and management. The following materials provide information for this purpose:

- the HBCU statute, Section 107(b)(3) of the Housing and Community Development Act of 1974, as amended;
- the HBCU governing regulations at 24 CFR 570.400, 570.404 and 24 CFR Part 570, Subparts A, C, J, K and O;
- the NOFA for the time period covering the monitoring review;
- the approved application and signed Grant Agreement;
- any amendments to the Grant Agreement;
- the semi-annual progress reports relevant to the monitoring time frame; and
- the completed Logic Models (Form HUD-96010) which identifies output and outcome achievements.

15-4 FILE SELECTION AND SAMPLING. As described in Chapter 2, the risk analysis process determines which HBCUs are to be monitored. Once that process has been completed, the HUD reviewer should consider the following factors when determining which specific files within an area should comprise review samples for the selected HBCU:

- A. Where feasible, initial file selection should be made using a random selection method.
- B. The reviewer would consider adding more files to this selection in order to:
 1. Examine files from each category of activity being reviewed (e.g., economic development, public facilities);
 2. Include a file(s) from each HBCU staff person responsible for program implementation or oversight;
 3. Expand the sample if possible to include additional files with the same characteristics, if indicated by the severity or nature of any problems(s) noted during the initial selection's review (for example, same problem category, same state staff person, same activities or other characteristics). This expanded sampling aids in determining whether problems were isolated events or represent a systemic problem.